From: SMITH, MARTIN L
To: Jump, Christine
Subject: RE: draft letter
Date: Friday, July 17, 2015 3:01:25 PM

Actually, this is precisely what I think we should do! Nice work!

Please take care on your trip and we'll see you when you get back..

Safety Starts With Me: Live It 3-6-5

Martin L. Smith
Director, Corrective Actions and Discontinued Operations
Clean Harbors Environmental Services, Inc.
13652 County Road 180
Carthage, Missouri 64836

417.358-0826 (O)
417.291.2170 (M)
417.359.8746 (F)

smith.martin@cleanharbors.com

www.cleanharbors.com

From: Jump, Christine [mailto:Jump.Chris@epa.gov]
Sent: Friday, July 17, 2015 2:55 PM
To: SMITH, MARTIN L
Subject: RE: draft letter

This is kind of a "stream of consciousness" response I'm throwing out for you to think about while I am gone, and then we can discuss it in detail when I get back in mid-August. Hopefully you will be able to attend the FIRST workshop on 7/23 which may give you some additional ideas of how this can work.

I was anticipating commenting on the Phase IV RFI which, based on my review to date, will include a request for you to add discussion and summary of the Chisolm creek investigation (pore water, sediment, surface water) similar to what was done for the ground water and soil; and add some qualifiers or caveats to statements where I think the data may be interpreted less definitively than stated in the Report. I see this more as a transparency issue for finalizing the RFI. I think the screening level risk evaluations and additional delineation could be done as an

addendum to the approved Phase IV document or part of a very focused CMS to justify remedy selection.

I was envisioning a separate IRM document that clearly lays out the work done in text and figures; the source areas removed, the areas that had to be expanded based on visual or olfactory evidence, or elevated confirmation data results (vertical pipes, drums, staining and odor). Ultimately the report would present of the final confirmation sample data that completion of the excavation was based on. I also see this document as providing data to justify monitoring well placement, and justifying the IRM as a significant part of the final remedy selection. I think it is cleaner documentation-wise to keep the IRM report separate.

As far as CMS/CMI documentation, I was envisioning a Lean "Remedy Selection Process (RSP) Meeting", which, if appropriate, could be documented in such a way to serve as the equivalent of a CMS. As far as meeting the permit requirements for CMS/CMI, I think we can justify this process by saying something like "the Remedy Selection process document is considered the functional equivalent of a CMS and is intended to meet the requirements of section XX in the permit" (obviously both parties would need to agree to the specific language). The RSP meeting would include everyone necessary to make a final decision on the Remedy selection (managers, consultants, experts…) and could include discussion of what alternative or alternatives are appropriate for the site?, is the work sufficient to justify this decision?, is the monitoring network sufficient?, what is an appropriate monitoring schedule?, when should the GW screening level assessment take place?, what are appropriate contingencies if ground water concentrations do not decrease as expected?, how do we assess up gradient contribution vs on-site contribution? If the RSP meeting concludes that there is an obvious remedy that meets the screening and balancing criteria, we can document the discussion and decisions in the meeting and move forward on a Statement of Basis to submit to the public for comment.

I think we could potentially select a final remedy with contingencies prior to the ground water screening level assessment being finalized, since that may be based on future sampling events.

Give me a call if this makes no sense or if you want to talk about it.

Chris Jump, L.G.
Waste Remediation and Permitting Branch
US EPA, Region 7
jump.chris@epa.gov
(913) 551-7141

Mailing address: 11201 Renner Boulevard, Lenexa, KS 66219

From: SMITH, MARTIN L [mailto:smith.martin@cleanharbors.com]
Sent: Friday, July 17, 2015 1:19 PM
To: Jump, Christine
Subject: RE: draft letter

Chris, thanks for getting this out today. I don't see anything that I would propose t be changed in your letter as written as it reflects our discussion on the phone yesterday.

The only question that I have is what needs to be done, aside from redoing the RA (screening level) with post IRM data, to finish the RFI? That document is really not giving us much even if its updated in light of the upcoming RMI report, CMS/CMI (focused) and final remedy selection. Using the Lean process, would we be able to combine the completion of all of these documents into something that advances us toward certifying the final remedy? Perhaps we may need to write an addendum to the current RFI with just a clearly written summary of the IRM process, what we need to complete a new SLRA, and then move to a single combined CMS/CMI. Thoughts?

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Martin L. Smith
Director, Corrective Actions and Discontinued Operations
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Carthage, Missouri 64836

417.358-0826 (O)
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417.359.8746 (F)

smith.martin@cleanharbors.com

www.cleanharbors.com

From: Jump, Christine [mailto:Jump.Chris@epa.gov]
Sent: Friday, July 17, 2015 12:09 PM
To: SMITH, MARTIN L
Subject: draft letter

Marty –

Attached is a draft version of the letter we discussed on Tuesday. I would like to try to finalize this letter today to get it sent out before I leave. Please call me if you would like to discuss it.

Thanks.

Chris Jump, L.G.
Waste Remediation and Permitting Branch
US EPA, Region 7
jump.chris@epa.gov
(913) 551-7141

Mailing address: 11201 Renner Boulevard, Lenexa, KS 66219